

REMARKS

Applicant has carefully reviewed the Application in light of the Office Action mailed October 16, 2008. At the time of the Office Action, Claims 1-3, 6-10, 12, 31-33, 36-40, 42-43, 45-46, and 48-88 were pending in the Application and stand rejected. Claims 13-30 were withdrawn. Applicant amends several Independent Claims without prejudice or disclaimer. The amendments to these claims are not the result of any Prior Art reference and, thus, do not narrow the scope of any of the claims. Furthermore, the amendments are not related to patentability issues and only further clarify subject matter already present. All of Applicant's amendments have only been done in order to advance prosecution in this case. Applicant respectfully requests reconsideration of the pending claims and favorable action in this case.

Section 103 Rejection

The Examiner rejects Claims 1-3, 31-33, 43, 46, 51, 53, 55-64 and 77-88 under 35 U.S.C. §103(a) as being unpatentable over Ben-Dor et al. (hereinafter "Ben-Dor") in view of Bondi (hereinafter "Bondi"). The Examiner further rejects Claims 6-10, 12, 36-40, 42, 45, 48-50, 52 and 54 under 35 U.S.C. §103(a) as being unpatentable over Ben-Dor in view of Bondi further in view of Krishnan (hereinafter "Krishnan"). Claims 11 and 14 are rejected under 35 U.S.C. §103(a) as being unpatentable over Ben-Dor in view of Bondi further in view of Krishnan and further in view of Gottfurcht et al. (hereinafter "Gottfurcht"). Claims 65-76 are rejected under 35 U.S.C. §103(a) as being unpatentable over Ben-Dor in view of Bondi further in view of Official Notice (hereinafter "Official Notice").

Applicant respectfully reminds the Examiner that to establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation; either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the prior reference (or references when combined) must teach or suggest all of the claim limitations.<sup>1</sup>

It is respectfully submitted that the rejected claims are patentable over the art of record based on at least the third criterion of obviousness: none of the references alone or in

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<sup>1</sup> See M.P.E.P. §2142-43.

combination teach, suggest, or disclose each and every claim limitation of the Independent Claims. For example, with respect to Independent Claim 1, no reference of record provides for "...the USB device adapters are coupled to USB devices that send USB packets to a USB protocol stack, which passes those packets to a network bridging task that identifies address information associated with the USB devices and the remote host control driver, and that passes the address information to the network protocol stack." Note that the addressing information being outlined by Independent Claim 1 is for both the USB devices and for the remote control host control driver: something that is not accounted for in any of the cited references. In essence, the activities outlined by Independent Claim 1 become comprehensive in nature, as they lead to information being provided to the network protocol stack, which in turn offers encapsulation capabilities.

The Examiner (in later, more specific claims) generically cites portions of Ben-Dor for all of these limitations. Specifically, the Examiner cites paragraph 73 of this reference, which provides:

**[0073]** When using the USB tunneling driver (redirector), under Windows 98 and Windows 2000, the USB tunneling driver (redirector) loads as a virtual USB Host Controller Driver (HCD). Normally a USB Host Controller Driver serves as an interface between the USB Bus Driver and actual USB hardware (registers and DMA interfaces), such as OHCI/UHCI based host silicon. The USB tunneling driver (redirector) loads as a virtual USB Host Controller Driver bus does not interface with actual USB hardware. Instead, it accepts USB Request Blocks (URBs) from the USB Bus Driver, encapsulates them within TCP or UDP, with a tunneling header, and sends them down the network-

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ing stack through use of the TDI Interface. All communication between the USB Bus Driver, the TDI Network Interface to the networking stack, and the USB tunneling driver (redirector) is based on IRPs (I/O Request Packets). IRPs are described in Microsoft's Device Driver Kit (DDK), and are the standard kernel mode method of communicating among drivers under Windows 98, Windows NT, and Windows 2000.

Thus, what is evident from this passage is that Ben-Dor fails to offer any system in which USB device adapters are coupled to USB devices, which send USB packets to a USB protocol stack that passes those packets to a network bridging task that identifies address information associated with the USB devices and the remote host control driver, and that passes the address information to the network protocol stack. The redirector does not provide address information for both items, nor is it even in communication with the network protocol stack: much less one that performs encapsulation capabilities, as outlined by Independent Claim 1. All these important limitations are provided for in Independent Claim 1, but no reference of record includes such elements. In addition, the other Independent Claims recite limitations that are similar, but not identical, and are therefore allowable over the proposed combination(s) using a similar rationale. In addition, the respective dependent claims from these Independent Claims should be allowable using analogous reasoning.

For at least these reasons, all of the pending claims have been shown to be allowable as they are patentable over the references of record. Notice to this effect is respectfully requested in the form of a full allowance of these claims.

CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for all other reasons clear and apparent, Applicant respectfully requests reconsideration and allowance of the pending claims.

This Response is being filed concurrently herewith a Petition for a One-Month Extension of Time and the appropriate large entity fee of \$130 is being paid concurrently herewith via Electronic Filing System (EFS) by way of credit card.

If there are matters that can be discussed by telephone to advance prosecution of this application, Applicant invites the Examiner to contact Thomas J. Frame at (214) 823-1241.

Respectfully submitted,

Patent Capital Group  
Attorneys for Applicant

/s/ Thomas J. Frame

Thomas J. Frame

Reg. No. 47,232

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Customer No. 78855